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May 10, 2005

VIA HAND DELIVERY

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Ms. Marlene H. Dortch, Esq.
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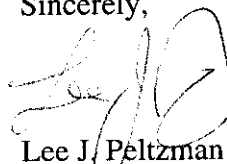
Federal Communications Commission
Office of Secretary

Re: MB Docket No. 05-143
RM-11221
Counterproposal
(Romney, West Virginia)

Dear Ms. Dortch:

Transmitted herewith, on behalf of Hardy County Broadcast Associates, is an original and four (4) copies of its Counterproposal in MB Docket No. 05-143. Please contact undersigned counsel in the event the Commission has any questions with respect to this filing.

Sincerely,



Lee J. Peltzman
Counsel for
HARDY COUNTY BROADCAST ASSOCIATES

LJP/kdm

Enclosure

No. 112221-0000 014

Before The
FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of

Federal Communications Commission
Office of Secretary

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
(Romney, West Virginia)

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)

MB Docket No. 05-143
RM-11221

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

COUNTERPROPOSAL

Hardy County Broadcast Associates ("HCBA"), by its counsel, hereby submits this counterproposal to the *Notice of Proposed Rule Making*, DA 05-743 (rel. March 23, 2005) ("*NPRM*") in the above-captioned proceeding. In support of its position, HCBA states the following:

I. Background

A Petition for Rule Making filed by Cornwell & Ailes, Inc. prompted the Media Bureau to issue the *NPRM*. The *NPRM* proposes to allot Channel 239A to Romney, West Virginia "as the community's first local service." In fact, however, the *NPRM* is incorrect as there are already two FM stations licensed to Romney, West Virginia: WDZN and WWSB. Therefore, the proposal to allot Channel 239A to Romney would be for a third service.

As a counterproposal in this proceeding, HCBA requests that the Commission instead allot Channel 239A to the community of Wardensville, West Virginia as a first local service. In

the event the Commission assigns Channel 239A to Wardensville, HCBA will apply for the station and, when its application is approved, will promptly construct a facility at Wardensville.

II. Discussion

As demonstrated in the attached Engineer Exhibit, Channel 239A can be allotted to Wardensville, West Virginia as a first service consistent with Section 73.207 of the Commission's rules. A 70 dBu signal will be provided to Wardensville from the proposed site. Wardensville is a "community" for FCC allotment purposes. Wardensville is located in Hardy County and is listed in the 2000 U.S. Census with a population of 246 people and, therefore, is presumed to have the status of a community for allotment purposes. *See Arnold and Columbus, California*, 7 FCC Rcd 6302 (1992). It enjoys the attributes that the Commission traditionally associates with a community. It has its own Government, with a mayor, a town recorder and a town counsel. It has a U.S. Post Office and its own zip code: 26851. The town provides services to its residents, including fire, volunteer rescue, and parks. The community is home to five churches, including the Wardensville Methodist Church. It offers medical facilities to its residents. The town has numerous businesses, including several which contain Wardensville in their name, such as Wardensville Video, Wardensville Pharmacy, Barr's IGA at Wardensville and Wardensville Medical Services. It is also home to its own chapter of the Veterans of Foreign Wars. *See Exhibit 1*. It is clear that Wardensville is a vibrant community, one that possesses the required attributes to be considered fully qualified as a community for allotment purposes. It deserves a first local broadcast service as proposed by HCBA.

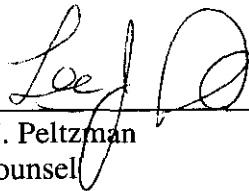
The Commission should favor a first local service at Wardensville over a third local service at Romney under its FM allotment priorities. *See Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88 (1982).

Accordingly, in view of the above, HCBA respectfully requests that the Commission amend the FM Table of Allotments to allot Channel 239A to the community of Wardensville, West Virginia.

Respectfully submitted,

HARDY COUNTY BROADCAST ASSOCIATES

By: _____


Lee J. Peltzman
Its Counsel
Shainis & Peltzman, Chartered
1850 M Street
Suite 240
Washington, DC 20036

Date: May 10, 2005

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ALAN E. GEARING, P.E.
TIMOTHY Z. SAWYER

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MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-RM:

**COUNTERPROPOSAL - MB DOCKET 05-143
RULE MAKING TO AMEND**

FM TABLE OF ALLOTMENTS

**ALLOT CH. 239A AT WARDENSVILLE, WV
IN LIEU OF
PROPOSED CH. 239A AT ROMNEY, WV**

MAY 10, 2005

**ENGINEERING STATEMENT PREPARED ON BEHALF OF
HARDY COUNTY BROADCAST ASSOCIATES**



ENGINEERING EXHIBIT EE-RM:

**COUNTERPROPOSAL - MB DOCKET 05-143
RULE MAKING TO AMEND**

FM TABLE OF ALLOTMENTS

**ALLOT CH. 239A AT WARDENSVILLE, WV
IN LIEU OF
PROPOSED CH. 239A AT ROMNEY, WV**

TABLE OF CONTENTS:

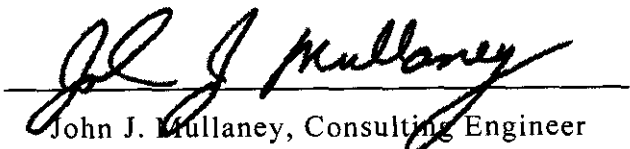
1. Declaration of Engineer
2. Narrative Statement
3. Figure 1, Channel Allocation Study for Ch. 239A.
From City Ref. Point for Wardensville, WV.
4. Figure 2, Coverage Comparison Map.

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Hardy County Broadcast Associates, to prepare the instant engineering exhibit in support of a rule making counterproposal petition to amend the FM Table of Allotments.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, reading "John J. Mullaney", is written over a horizontal line.

John J. Mullaney, Consulting Engineer

Executed on the 10th day of May 2005

ENGINEERING EXHIBIT EE-RM:

**COUNTERPROPOSAL - MB DOCKET 05-143
RULE MAKING TO AMEND**

FM TABLE OF ALLOTMENTS

**ALLOT CH. 239A AT WARDENSVILLE, WV
IN LIEU OF
PROPOSED CH. 239A AT ROMNEY, WV**

NARRATIVE STATEMENT:

This engineering statement has been prepared on behalf of Hardy County Broadcast Associates. The purpose of this statement is to provide engineering in support of a rule making counterproposal petition to amend the FM Table of Allotments to allot Ch. 239A to Wardensville, WV, in lieu of the present proposal in MB Docket 05-143 to allot Ch. 239A to Romney, WV.

The grant of this proposal will result in the first aural service to Wardensville, WV (Hardy County) while the proposed allotment would result in the third aural service to Romney, WV (Hampshire County). According to the 2000 US Census Wardensville has a population of 246 persons while Romney has a population of 1,940 persons.

The proposed reference point is not within 290 kilometers (180 miles) of a United States Border and, therefore, foreign concurrence is not required.

Proposed Reference Site

For the purposes of this rule making the applicant proposes to use the city reference coordinates for Wardensville, WV.

N. Latitude: 39° 04' 30" NAD-27
W. Longitude: 78° 35' 53"

The proposed reference site will provide an unobstructed view of the city of license, Wardensville, WV and is located close enough to serve the entire community with the required 3.16 mV/M or 70 dBu contour.

Channel Allocation Study

Figure 1 is a Channel Allocation Study from the city reference point for Wardensville, WV. The study indicates the actual & required separation in kilometers to all licenses, construction permits, applications, vacant allocations and pending rule makings. From this study it can be determined that proposed reference point exceeds all of these minimum separations.

It should be noted that Docket 05-143 proposes to allot Ch. 239A to Romney, WV, a community located just 32.6 km away. The rules require a minimum separation of 115 km between two co-channel Class A FM facilities. As a result, both proposals are mutually exclusive with each other (only one can be granted).

Public Interest Showing

The allotment of 239A to Wardensville, WV, would represent a **first aural service**. The population contained within the allotment primary contour (28.3 km

circle) is 41,440 persons. The Romney allotment would result in a **third aural service**. The population contained within the allotment primary contour (28.3 km circle) is 47,510 persons.

SUMMARY

Hardy County Broadcast Associates submits this rule making counterproposal petition to amend the FM Table of Allotments to allot Ch. 239A to Wardensville, WV, in lieu of the present proposal in MB Docket 05-143 to allot Ch. 239A to Romney, WV. The grant of this proposal will result in the **first** aural service to Wardensville, WV, while the proposed allotment would result in the third aural service to Romney, WV.

	Present	Proposed
Romney, WV	239A RM, 261A, *281A	261A, *281A
Wardensville, WV	- - - -	239A

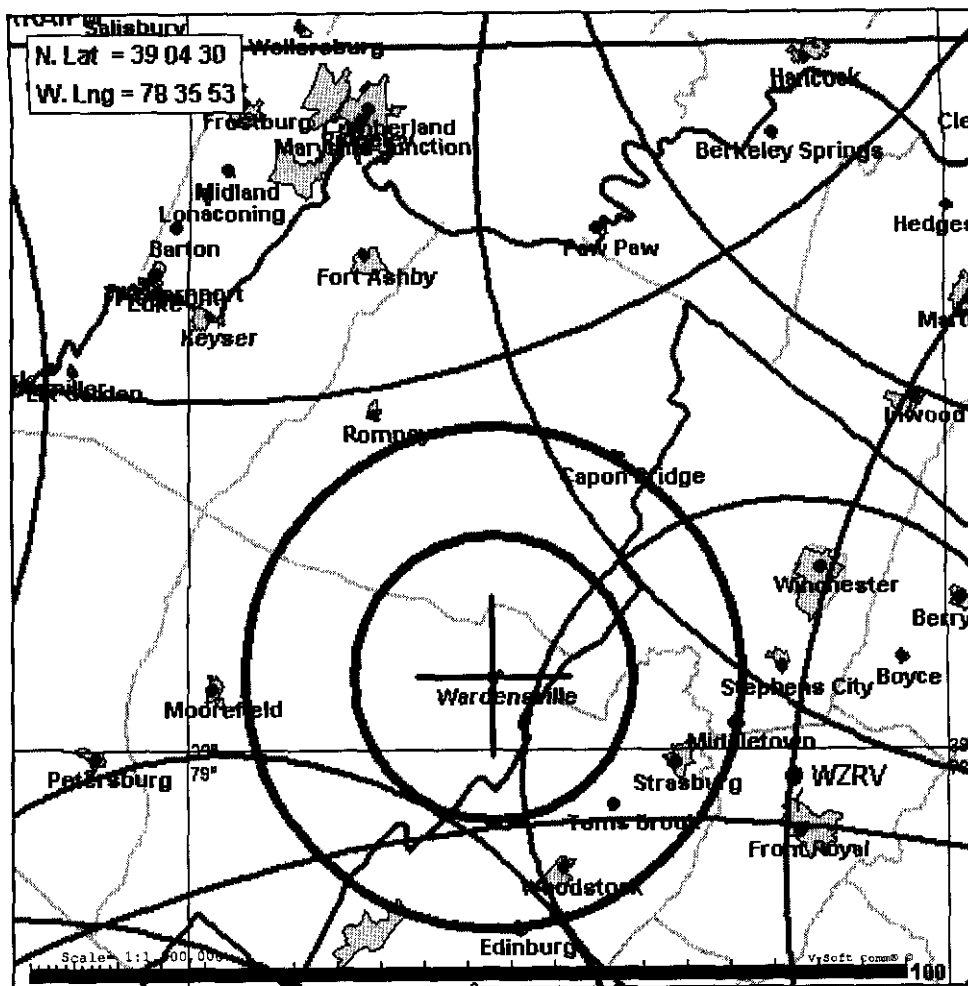
If granted, Hardy County Broadcast Associates will file an auction application for construction permit.


John J. Mullaney, Consulting Engineer

May 10, 2005.

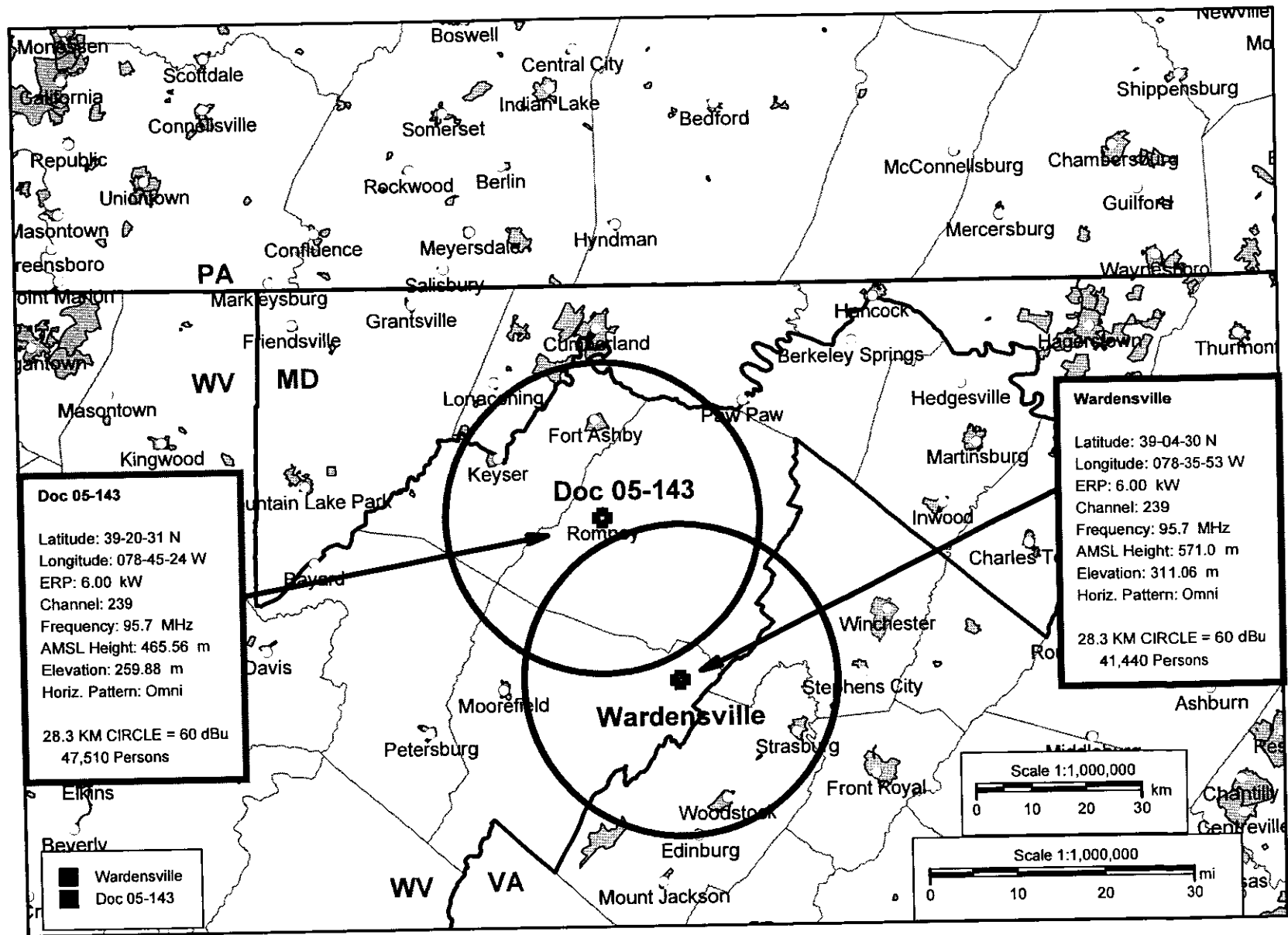
CH 239 A , 95.7 MHz

MAY 2005



Data Date:05-07-05 Job Date:05-07-05

Call	CH#	Type	Location		Azi	D-KM	FCC	Margin	
RADD	239A	ADD	Romney	WV	335.3	32.64	115.0	-82.36	MX
WZRV	237A	LIC	Front Royal	VA	107.8	36.06	31.0	5.06	
WJDV	241B1	LIC	Broadway	VA	208.3	64.44	48.0	16.44	
WFLOFM	239B	LIC-D	Farmville	VA	174.5	194.98	178.0	16.98	
WICL	240A	LIC	Williamsport	MD	49.8	91.83	72.0	19.83	
WFGIFM	238B	LIC	Johnstown	PA	347.3	147.69	113.0	34.69	
WPGCFM	238B	LIC	Morningside	MD	98.6	148.07	113.0	35.07	
WZXI	238A	LIC	Buffalo Gap	VA	209.0	113.22	72.0	41.22	
WIKZ	236B	LIC-D	Chambersburg	PA	38.9	122.45	69.0	53.45	
WDKL	240A	LIC	Grafton	WV	284.6	127.01	72.0	55.01	



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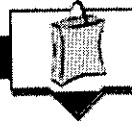
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Wardensville, WV 26851

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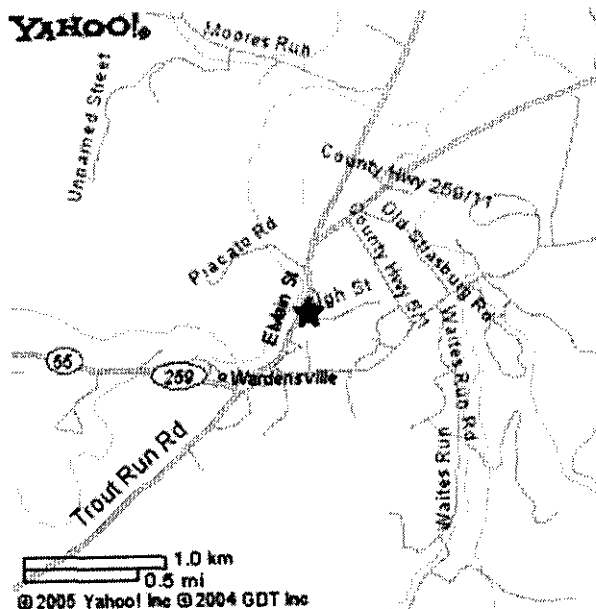
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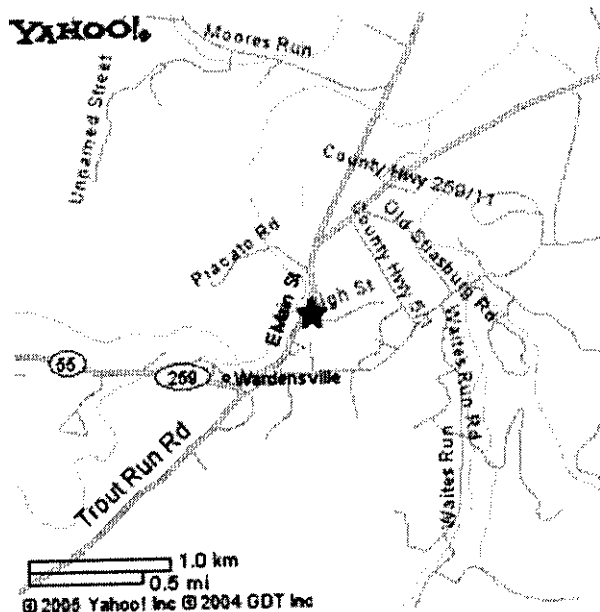
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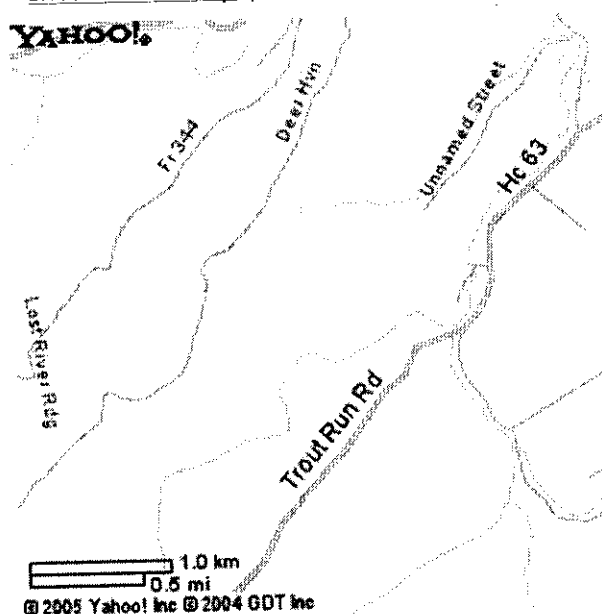
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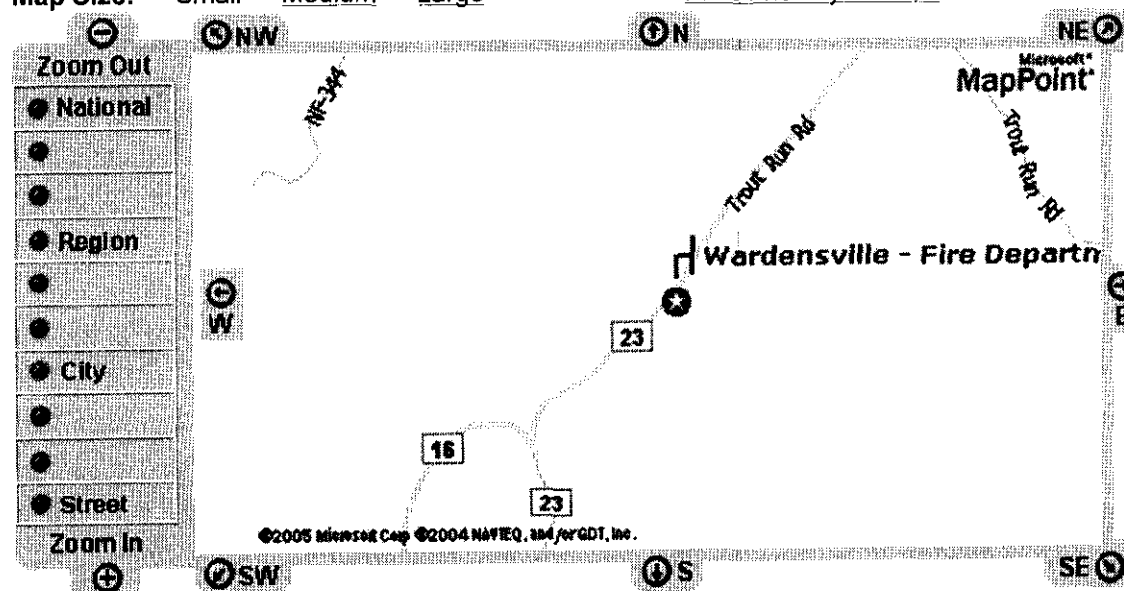
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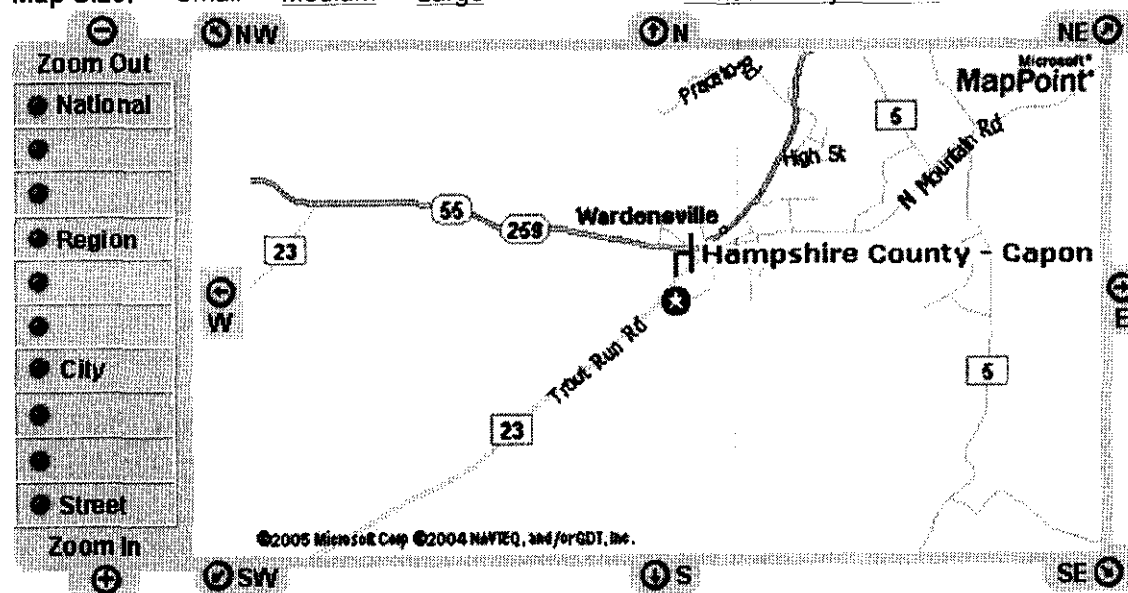
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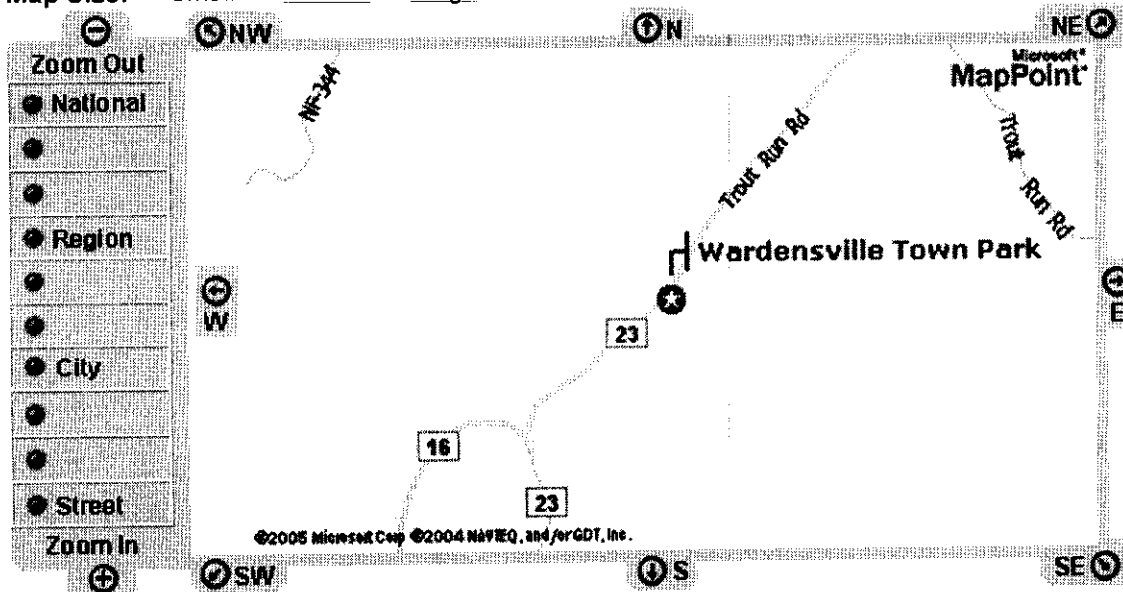
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US Post Office

Address: 5 W Main St, Wardensville, WV 26851
Phone: (800) 275-8777

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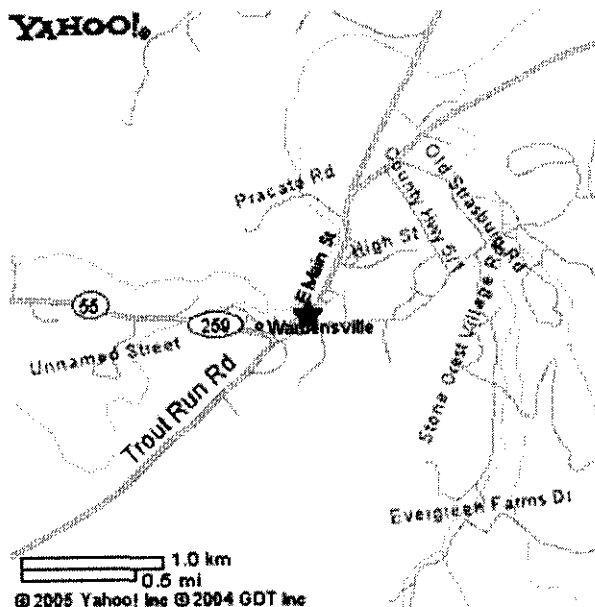
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Assembly Of God Church

Address: PO Box 273, Wardensville, WV 26851

Phone: (304) 874-3037

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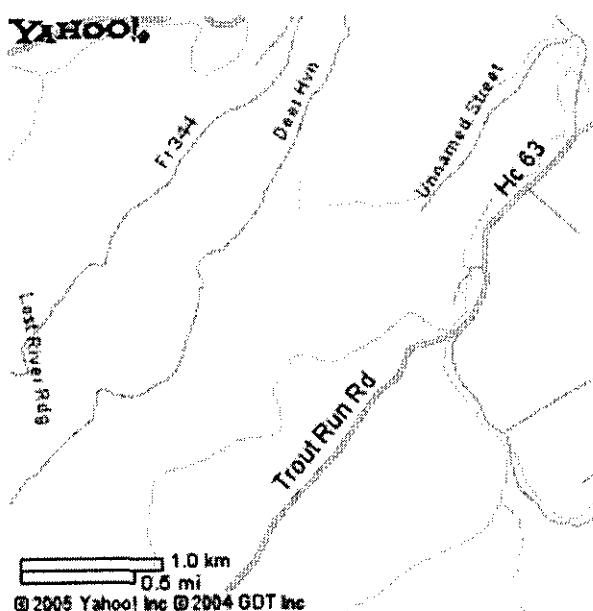
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Crest Hill Church

Address: Route 259, Wardensville, WV 26851

Phone: (304) 874-3928

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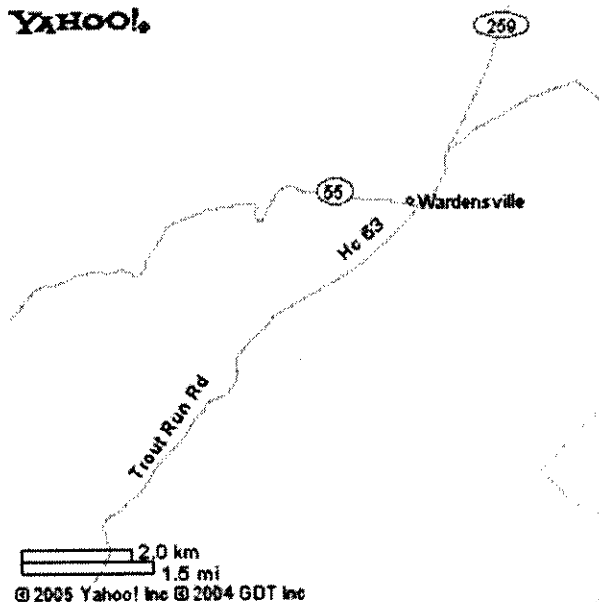


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Faith Mission Church

Address: 30 Carpenters Ave, Wardensville, WV 26851

Phone: (304) 874-3409

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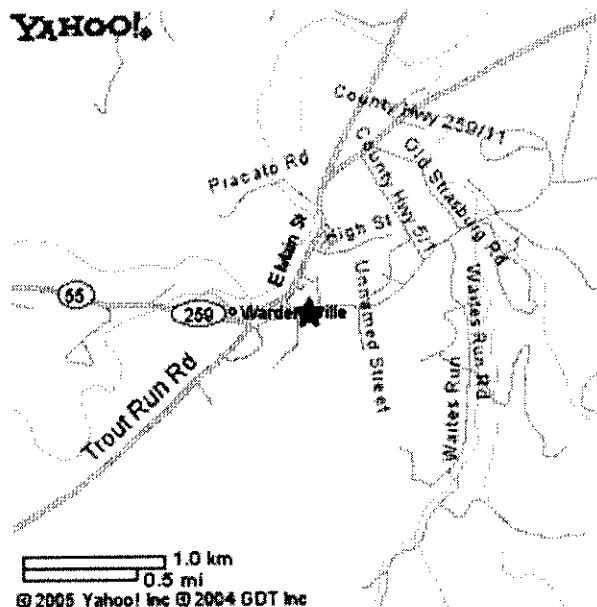
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Lutheran Parish Capon N River

Address: Main St, Wardensville, WV 26851

Phone: (304) 874-3860

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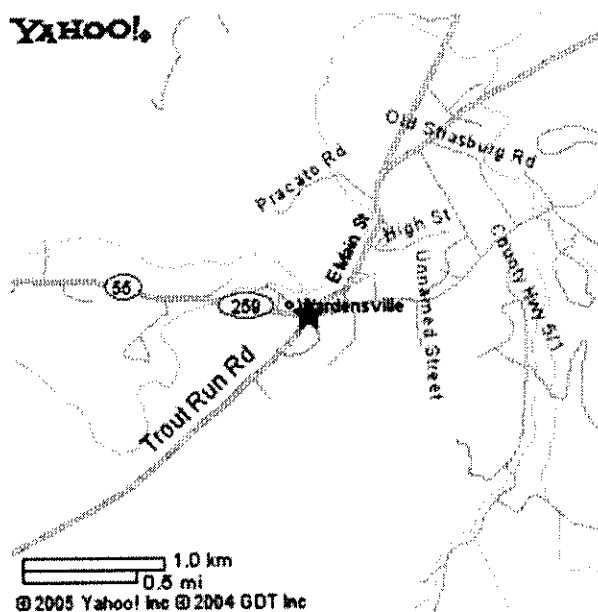


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Wardensville Methodist Church

Address: Main St, Wardensville, WV 26851

Phone: (304) 874-3785

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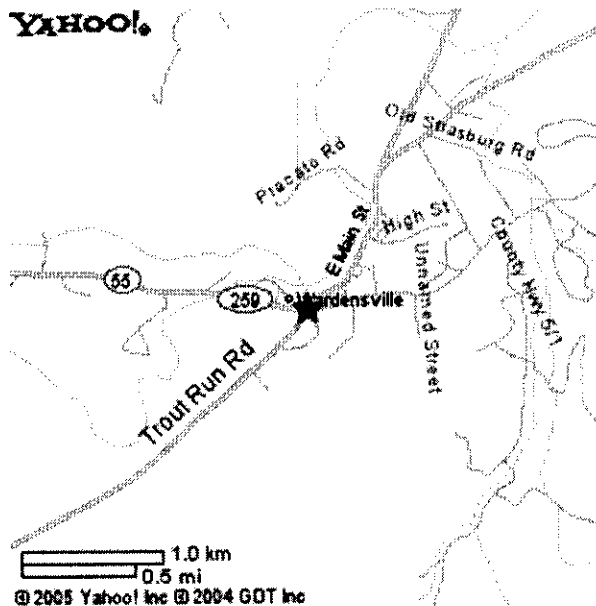
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Capon Valley Beauty Shop

Address: 27041 State Road 55, Wardensville, WV 26851

Phone: (304) 874-3228

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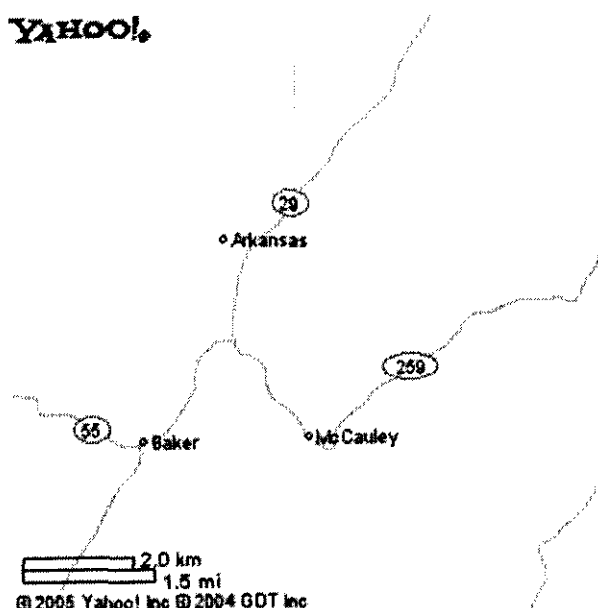
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Country Cuttery Inc

Address: 260 W Main St, Wardensville, WV 26851

Phone: (304) 874-3263



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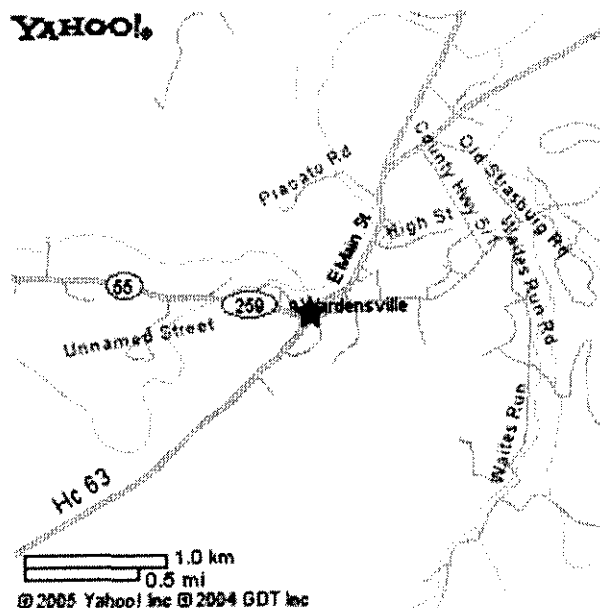
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Address: 120 Main St # A, Wardensville, WV 26851

Phone: (304) 874-3576

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Shear Creation

Address: Hc 64 Box 225, Wardensville, WV 26851
Phone: (304) 874-3446

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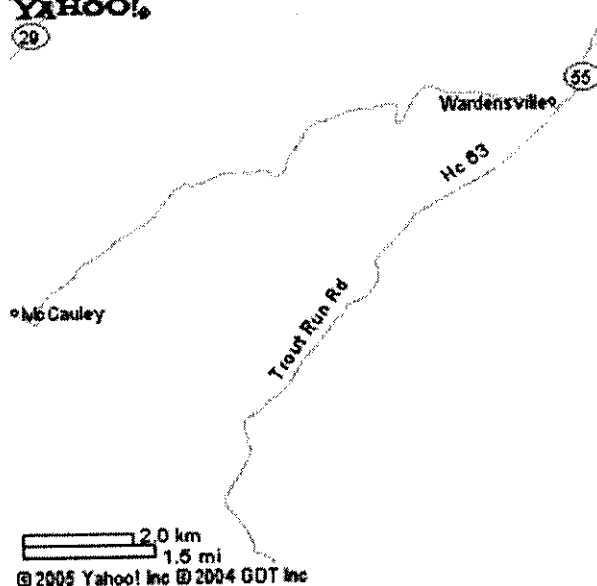
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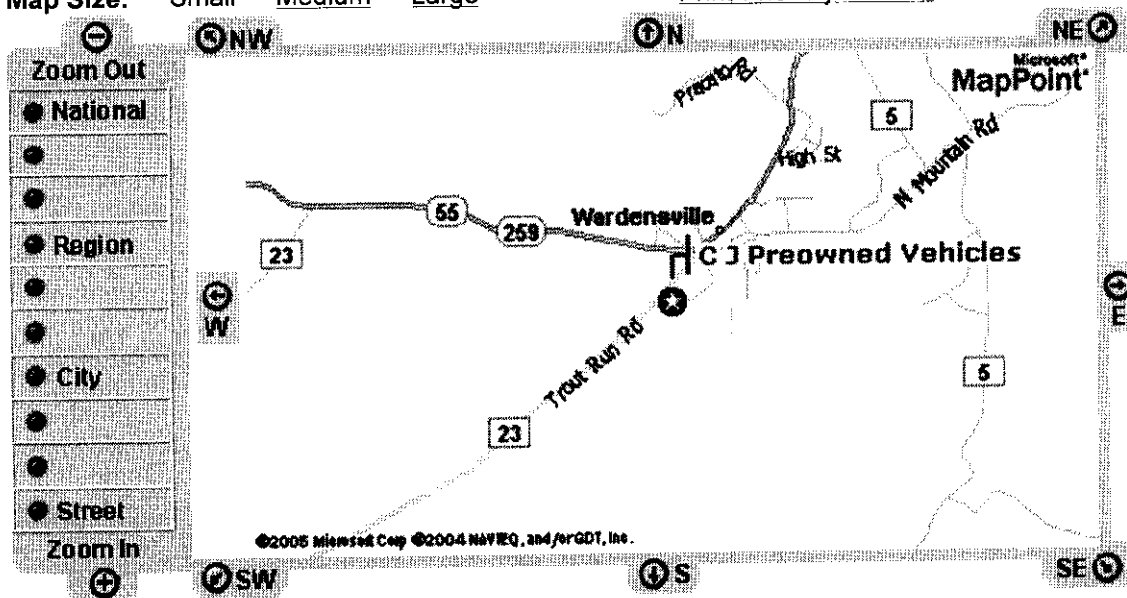
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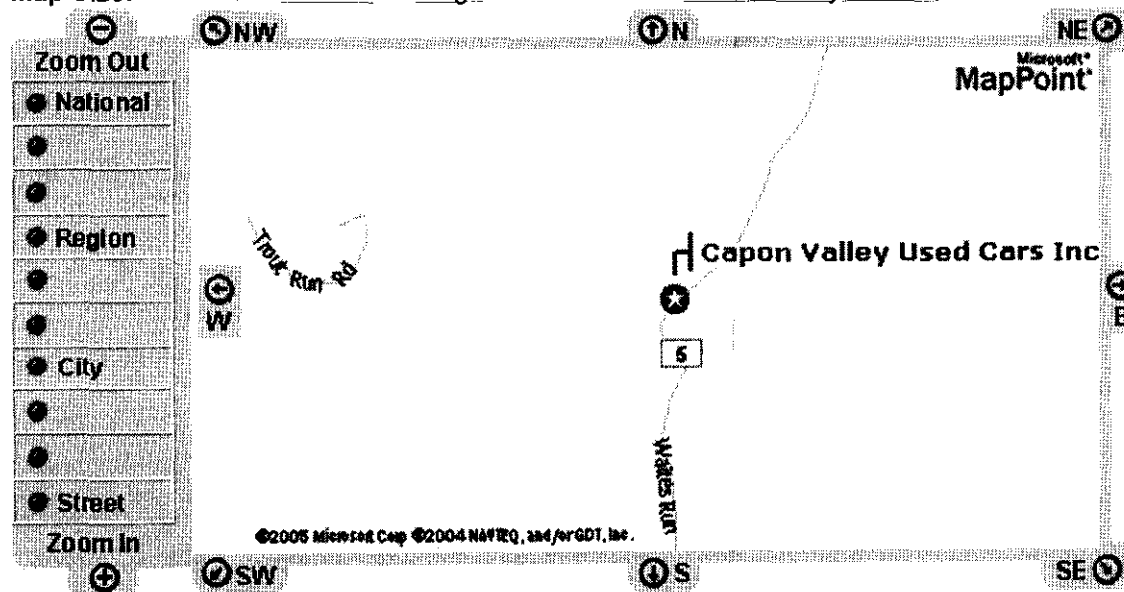
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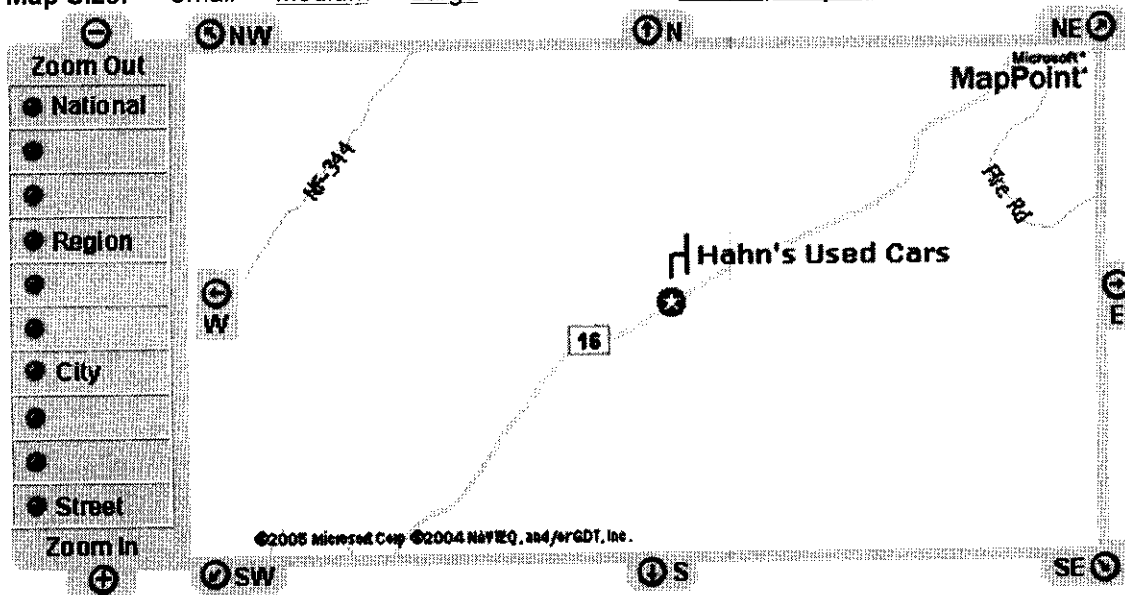
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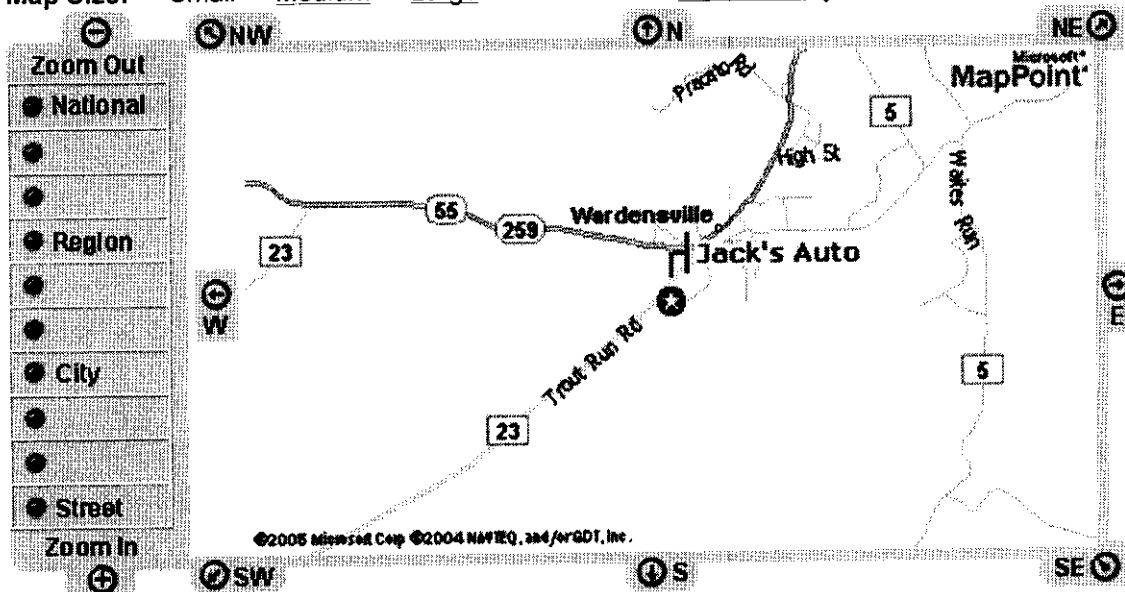
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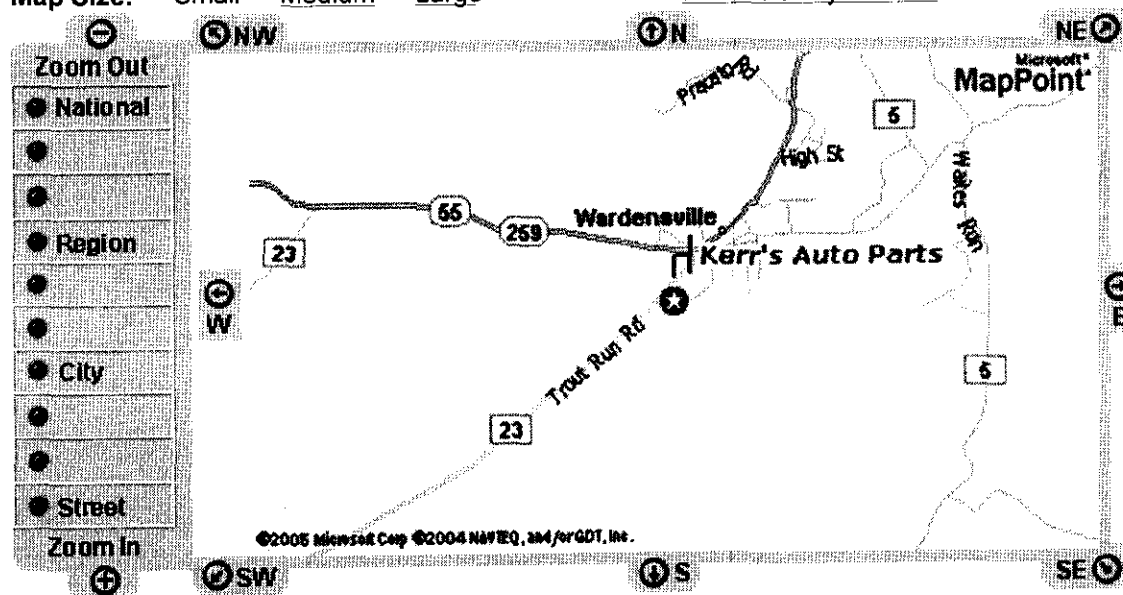
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RR 55, Wardensville, WV 26851

(304) 874-3012

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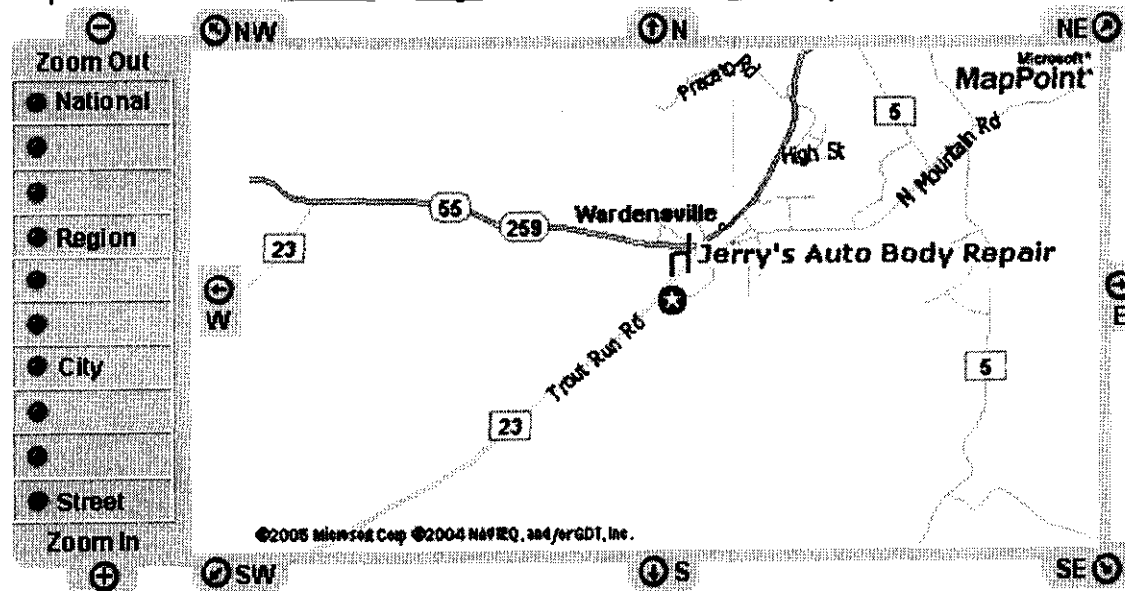
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RR 259, Wardensville, WV 26851

(304) 874-3542

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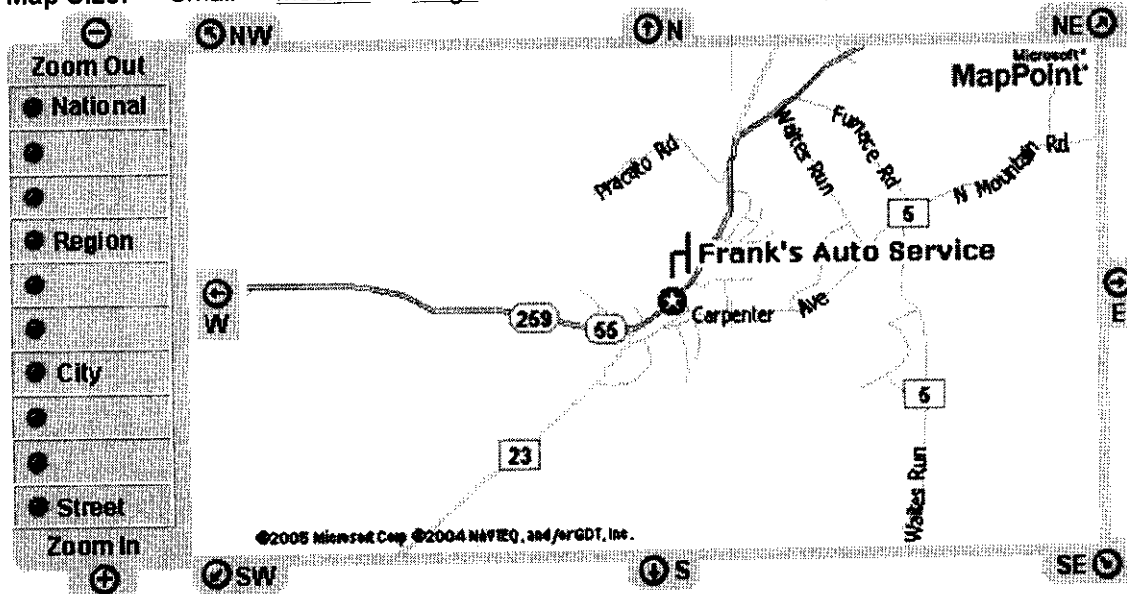
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25 West Main Street, Wardensville, WV 26851

(304) 874-4255

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Location: ★ Wardensville

[Top](#) > [Automotive](#) > [Repair and Service](#) > [All](#)

Tim's Garage & Body Shop

Address: 111 Sand Field Rd, Wardensville, WV 26851
Phone: (304) 874-3084

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Related Categories

This listing appears in:

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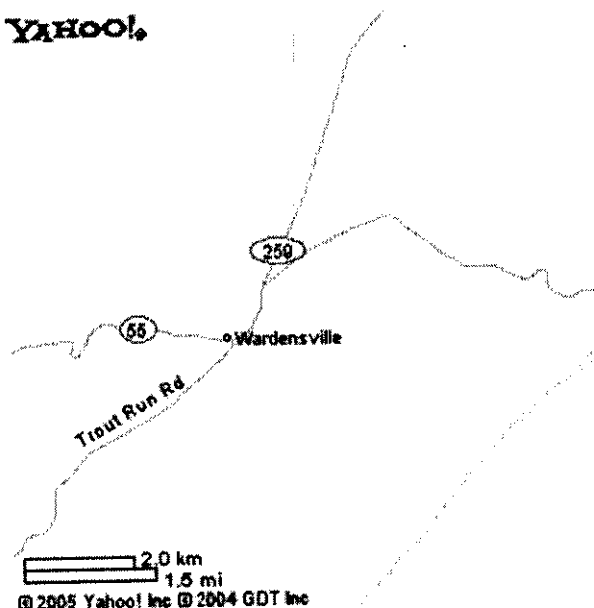
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Garrett, Bradford - Garrett Insurance

Address: 175 W Main St, Wardensville, WV 26851

Phone: (304) 874-3512

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- [Insurance > All](#)

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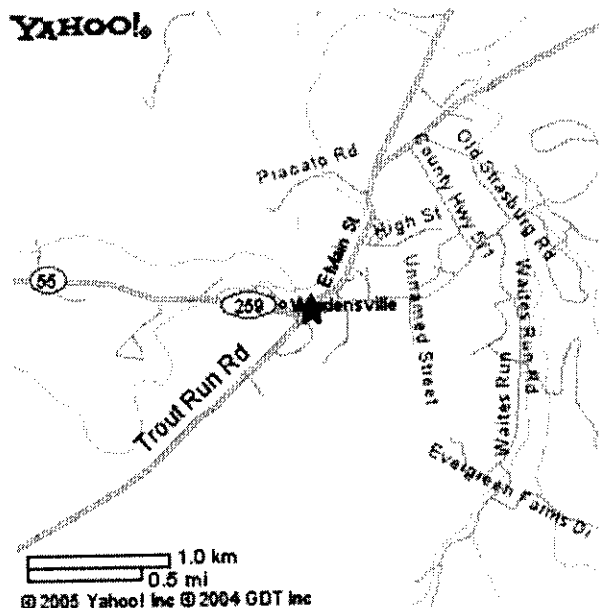
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Wardensville, WV :

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Michael, Harold K - Nationwide Insurance

Address: 102 Main St # B, Wardensville, WV 26851

Phone: (304) 874-3777

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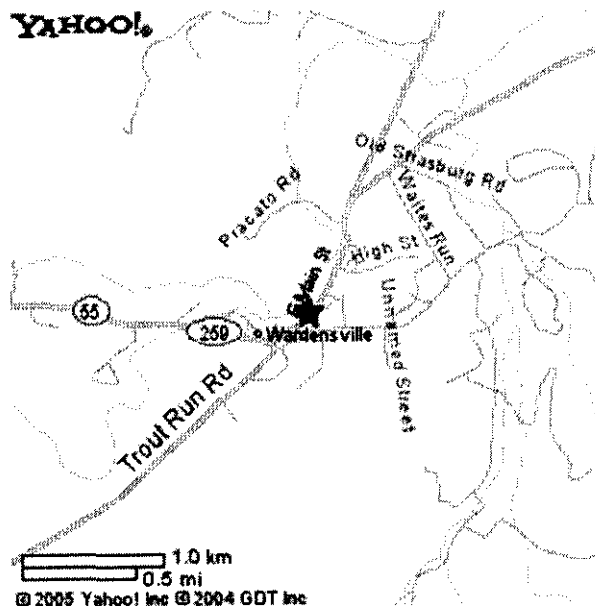
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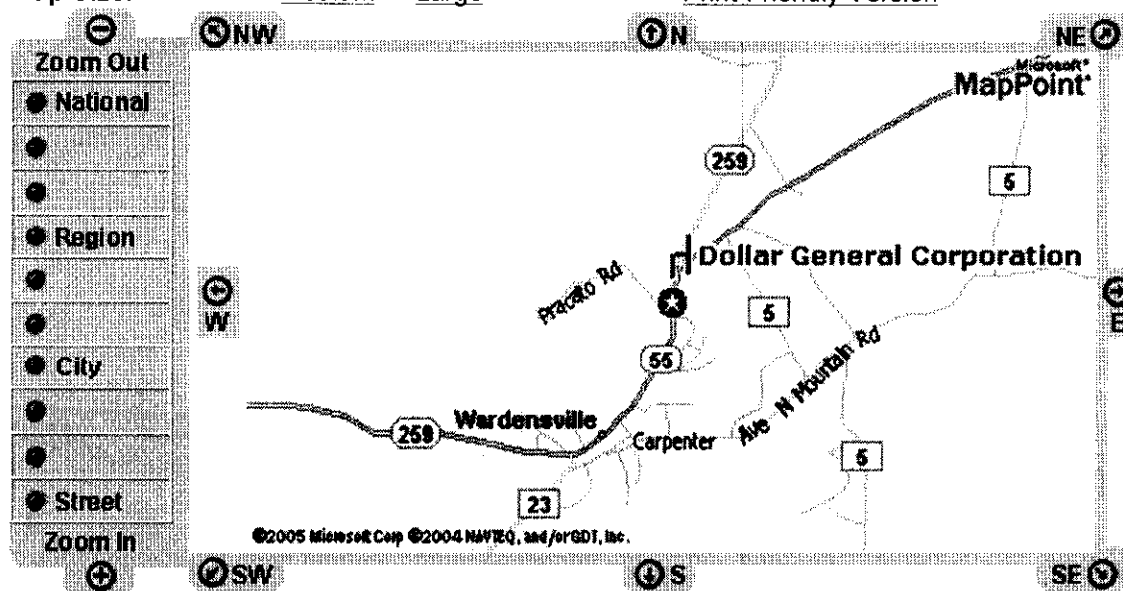
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417 East Main, Wardensville, WV 26851

(304) 874-4264

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(304) 874-4012325 E Main St
Wardensville, WV [Map](#)**Hahn, Nancy - Wardensville Medical Svc**
(304) 874-4012325 E Main St
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(304) 874-395025 Warrior Way
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(304) 874-3733PO Box 2
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(304) 874-3785Main St
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(304) 874-3687333 E Main St
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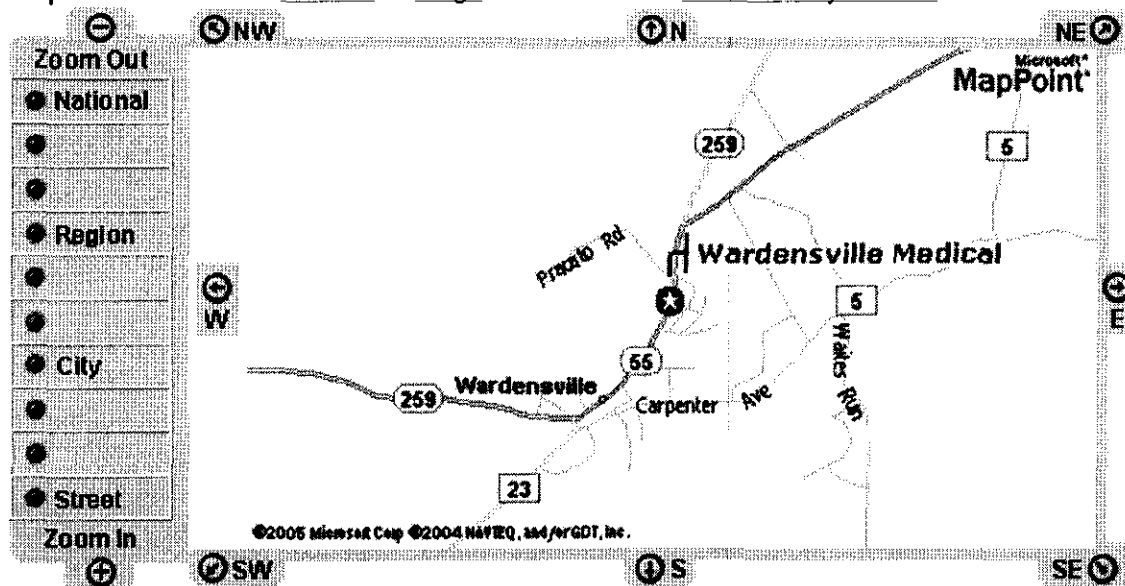
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325 Main Street, Wardensville, WV 26851

(304) 874-4012

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Hahn, Nancy - Wardensville Medical Svc

Address: 325 E Main St, Wardensville, WV 26851

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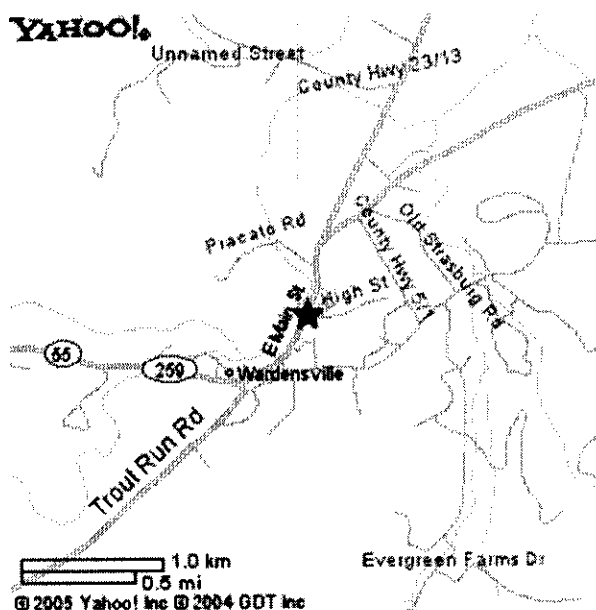
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Rescare West Virginia Inc

Address: Town Park, Wardensville, WV 26851
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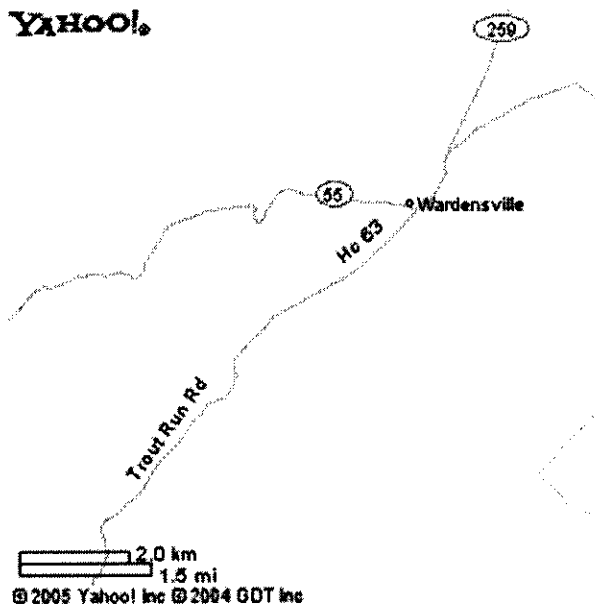


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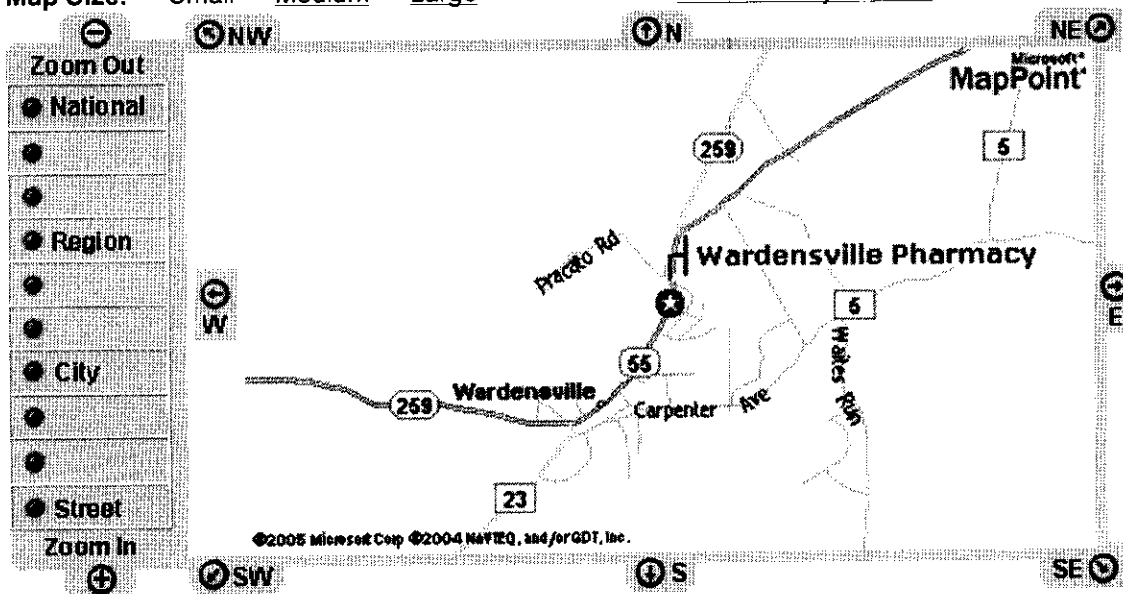
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333 East Main, Wardensville, WV 26851

(304) 874-3687

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Veterans Of Foreign Wars

Address: 195 Main St, Wardsville, WV 26851

Phone: (304) 874-3711

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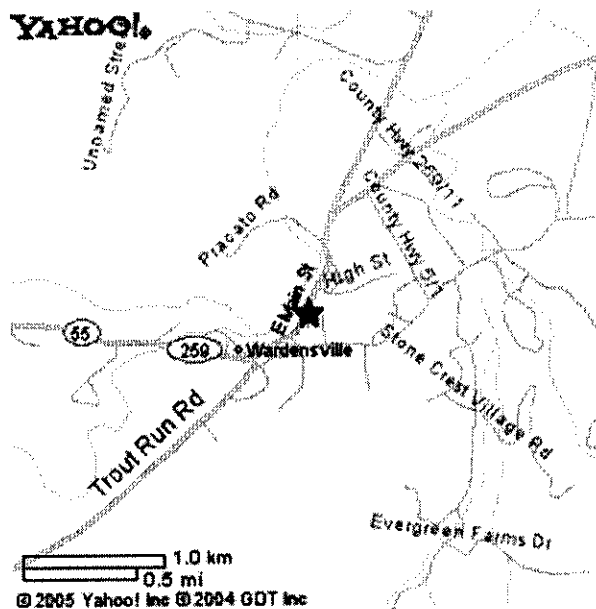
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Phone: (304) 874-3902

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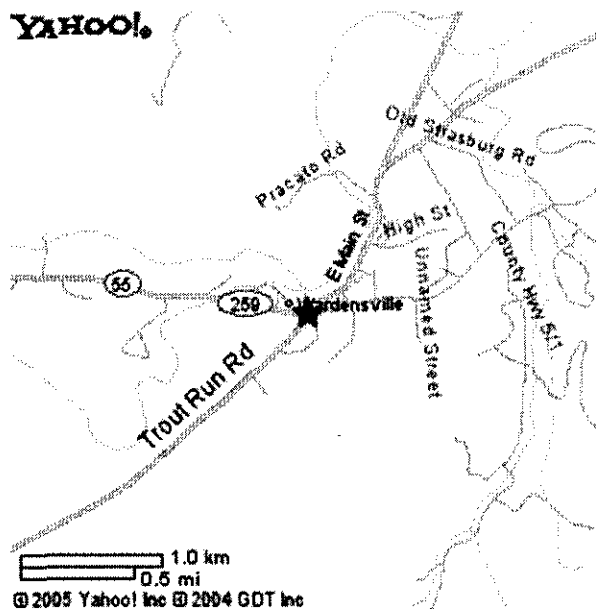
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